



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

409 3rd Street, SW, Suite 300  
Washington, DC 20024

## WARNING LETTER

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 24, 2007

Mr Phil Andreas  
Vice President of Operations  
NSTAR/Hopkinton LNG Corporation  
1 NSTAR Way  
Westwood, MA 02090-9230

**CPF 1-2007-3005W**

Dear Mr Andreas

During the week of February 20, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your liquefied natural gas (LNG) plant in Hopkinton, Massachusetts

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is

**1. § 193.2619 Control systems.**

**(c)(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed six months.**

The following control components utilized for fire protection require testing at intervals not to exceed six months. The required six month inspection and testing interval for components of the fire control system were exceeded as indicated in the table below

Component	Test Dates	Description	6-months exceeded by '05 to '06' in '06
PSL-FD-1	11/16/05, 6/8/06, 12/19/06	Low pressure setting for fire water system	23 days, 11 days
FSH-FD-1	11/16/05, 6/8/06, 12/19/06	Set time delay for firewater header	23 days, 11 days
PSH-1	11/16/05, 6/1/06, 12/19/06	Sprinkler water flow	16 days, 18 days
LS-1	11/16/05, 6/8/06, 12/19/06	Deluge system trigger limit switch	23 days, 11 days
PSL-1	11/16/05, 6/8/06, 12/19/06	Deluge system nitrogen pressure switch	23 days, 11 days
PSL-1306	11/18/05, 6/2/06, 12/19/06	Start/stop switch for elec Fire water pump	15 days, 17 days
PSL-1050	11/16/05, 6/2/06, 12/19/06	Start/stop switch for diesel fire water pump	17 days, 17 days
PSL-1410B	11/16/05, 6/1/06, 12/19/06	Fire water tank low level beacon	16 days, 18 days
PSL-1032	11/16/05, 6/2/06, 12/19/06	Jockey water pump set switch	17 days, 17 days
PLS-1032A	11/16/05, 6/2/06, 12/19/06	Fire water switch, LP alarm	17 days, 17 days
TSHLC1050	11/16/05, 6/1/06, 12/19/06	Building vent control system	16 days, 18 days
PSL 3073-2	11/18/05, 6/2/06, 12/19/06	Firewater make-up control switch	15 days, 17 days
PSL 3073-1	11/18/05, 6/2/06, 12/19/06	Low firewater tank level switch	15 days, 17 days
PSL 3072-2	11/18/05, 6/2/06, 12/19/06	10" firewater makeup set switch	15 days, 17 days
PSL 3071-1	11/18/05, 6/2/06, 12/19/06	2" firewater makeup set switch	15 days, 17 days
NA	11/21/05, 6/8/06, 12/19/06	Vaporizer deluge flow switch	18 days, 11 days
NA	12/12/04, 6/14/05	Vaporizer deluge flow switch *	12 days, ('04 to '05)
NA	11/21/05, 6/8/06, 12/19/06	HHP House foam flow alarm	18 days, 11 days
NA	11/21/05, 6/8/06, 12/19/06	Trailer loading deluge flow alarm	18 days, 11 days
NA	12/2/04, 6/14/05,	Trailer loading deluge flow alarm*	12 day ('04 to '05)
16.10A	11/21/05, 6/8/06, 12/19/06	Foam flow alarm	18 days, 11 days

16.10B	11/21/05, 6/8/06, 12/19/06	Foam flow alarm	18 days, 11 days
FS-2	11/16/05, 6/1/06, 12/19/06	Diesel fw pump bldg sprinkler flow	16 days, 18 days
NA	11/18/05, 6/2/06, 12/19/06	Sensing Line	15 days, 17 days

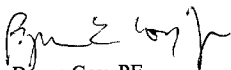
(\*This is the same component as in the preceding line, but a violation was discovered in the preceding 6-month interval )

The above intervals are based on the maintenance records reviewed during the inspection

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. Also, for LNG facilities, an additional penalty of not more than \$50,000 for each violation may be imposed. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in NSTAR/Hopkinton LNG Corporation being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2007-3005W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U S C 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U S C 552(b).

Sincerely,



Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration